1	PHILLIP A. TALBERT		
2	United States Attorney WILLY M. LE		
3	Acting Regional Chief Counsel, Region VI PETER K. THOMPSON, of Counsel		
	Acting Regional Chief Counsel, Region IX		
4	Social Security Administration		
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10	Attorneys for Defendant		
	UNITED STATES DISTRICT COURT		
11	EASTERN DISTRICT OF CALIFORNIA		
12			
13	SACRAMER	NTO DIVISION	
_{[4}) G N 221 00505 DMG	
	RONALD JAY PAANA, SR.,) Case No.: 2:21-cv-00505-DMC	
15	Plaintiff,) STIPULATION AND ORDER FOR AN EXTENSION OF TIME	
16	,)	
17	vs. KILOLO KIJAKAZI,)	
18	Acting Commissioner of Social Security,	ĺ	
	D.C. L.))	
19	Defendant.)	
20		,	
21	Pending the Court's approval, the time	for Defendant to respond to Plaintiff's Motion for	
22	Summary Judgment be extended thirty (60) days from July 11, 2022, up to and including		
23			
	September 9, 2022. This is the Defendant's first request for an extension.		
24	As this Court no doubt knows, Social Security case filings in federal court increased		
25	significantly in the past year. The increased filings, compounded by COVID-related delays in		
26	transcript production and attorney attrition, have resulted in an increased workload and		
27	competing deadlines. Due to these reasons, thi	s case has been transferred from the Region IX	

Office for the Office of General Counsel to the Region VI Office for the Office of General

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1	Counsel. The newly assigned attorney is prioritizing this case for completion while actively	
2	handling at least 25 district court cases and other assigned workload demands, including	
3	jurisdictional coordinator duties, attorney fee coordinator duties, and appellate workload duties	
4	The parties further stipulate that the	Court's Scheduling Order shall be modified
5	accordingly.	
6		
7		Respectfully submitted,
8	Dated: July 8, 2022	/s/ Joseph Clayton Fraulob (*as authorized by Fiona Harris via telephone on
10		July 7, 2022) ¹ JASON CLAYTON FRAULOB
11		Attorney for Plaintiff
12	Dated: July 8, 2022	PHILLIP A. TALBERT United States Attorney
13 14		WILLY M. LE
15		Acting Regional Chief Counsel, Region VI
16		PETER THOMPSON Acting Regional Chief Counsel, Region IX
17		Social Security Administration
18	By:	/s/ Tracey Wirmani TRACEY WIRMANI
19		Special Assistant U.S. Attorney
20		Attorneys for Defendant
21 22		
23		
24		
25		
26		
27		
28	¹ The undersigned contacted Mr. Fraulob's law firm via telephone on July 7, 2022. Mr. Fraulob's assistant, Fiona Harris, indicated that he is out of town this week. However, she wa able to authorize this stipulation on his behalf.	

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Stip. for Ext.; 2:21-cv-00505-DMC

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including September 9, 2022, to respond to Plaintiff's Motion for Summary Judgment.

Dated: July 19, 2022

DENNIS M. COTA UNITED STATES MAGISTRATE JUDGE